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November 12, 1997

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EX PARTE OR LATE FILED

William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

RECEIVED

NOV 12 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

VIA HAND DELIVERY

Re: WT Docket No. 97-112; Cellular Service and Other Commercial Mobile Radio
Services in the Gulf of Mexico
EX PARTE MEETING

Dear Mr. Caton:

The purpose of this letter is to provide notice that, on November 12, 1997, Jack Richards and Brian Ashby, representatives of Shell Offshore Services Company ("SOSCo"), met with David Furth, Chief of the Commercial Wireless Division, to discuss the above-captioned proceeding. Wilbert Nixon and Linda Chang, attorneys in the Auctions Division, also were present at the meeting.

The discussion concerned the Federal Communications Commission's ("Commission's") proposal to license non-cellular Commercial Mobile Radio Service ("CMRS") spectrum in the Gulf of Mexico. As representatives of SOSCo, a telecommunications service provider active in the Gulf of Mexico and an affiliate of the largest petroleum and natural gas producer in the Gulf of Mexico, we expressed our belief that the Commission should license all non-cellular CMRS spectrum, except Personal Communications Service spectrum, in the Gulf of Mexico. A copy of the "talk sheet" used in the meeting, which summarizes SOSCo's position vis-a-vis the proceeding, is attached.

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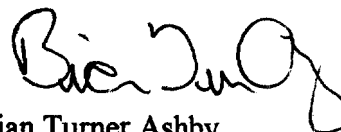
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William F. Caton
November 12, 1997
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KELLER AND HECKMAN LLP

Should further information be required, the Commission is respectfully requested to contact the undersigned.

Very truly yours,

A handwritten signature in black ink, appearing to read "Brian Turner Ashby". The signature is fluid and cursive, with the first name "Brian" being the most prominent.

Brian Turner Ashby

Enclosure

**SHELL OFFSHORE SERVICES COMPANY
ESTABLISHMENT OF A WIRELESS COMMUNICATIONS SERVICE AT 2.3 GHz
GN DOCKET NO. 96-228**

- As deepwater production platforms are deployed in the GOM, experts predict that the GOM will become the largest oil and natural gas frontier in the U.S. This oil and natural gas is critical to the nation's economy and will decrease dependence on foreign sources.
- Deepwater exploration and production activity in the GOM has led to an increase in the demand for wireless telecommunications services in the GOM. Service providers, however, are having difficulty meeting this demand:
 - Certain requirements unique to the GOM cannot be met using existing spectrum allocations. For instance, reliable, point-to-point microwave links are not possible at deepwater production platforms using spectrum above 2 GHz. No spectrum is available at or below 2 GHz on a primary basis.
 - There is a dearth of spectrum available because the GOM has not been included in recent spectrum auctions. Currently, it is not possible to obtain PCS, MDS, or SMR licenses in the GOM.
- The Commission should allocate the 2.3 GHz band for a WCS in the GOM to help meet the growing need for wireless telecommunications services. As long as all of the prerequisites for an auction are present, including mutual exclusivity, this spectrum should be auctioned.
- The Commission should issue a single license for the entire GOM. The GOM is a unique environment that is distinct from onshore locations. In previous auctions, unique locations such as American Samoa and the Northern Mariana Islands were treated as distinct geographic areas for licensing purposes.
- The Commission should issue a single license for all 30 MHz of spectrum slated for allocation to the WCS. If the spectrum were to be divided among one or more WCS licensees, there would be insufficient spectrum to provide the sorts of services, such as Internet access and videoconferencing, needed by the businesses that populate the GOM.
- The GOM should be defined in the same way that it was for purposes of cellular licensing. The Commission clearly has jurisdiction to issue licenses in the GOM because thousands of cellular, SMR, microwave, and private land mobile licenses already have been issued for GOM operations.